

Introduction

The Children's Television Act of 1990 was passed by Congress in order to improve the quality and quantity of children's educational and informational television programming. Now almost three years since the new law took effect (October 1991), it is possible to begin evaluating the impact of the Act and the subsequent issuance of FCC regulations concerning this new law.

This study, through a survey of commercial television stations, examines the effects of this law in terms of whether or not there has been any change in the amount of educational and informational programming being aired by commercial television stations. The type of educational and informational programming examined only includes core children's programming 30 minutes or longer in length. All of the other programming that satisfies the station's requirements under the Act, such as program segments of shorter than 30 minutes, public service announcements oriented towards children, and general interest programming are not examined. Questionnaires were sent to commercial stations asking them to review their program schedules and compile the amount of this programming before and after the Act was passed.

The results from this survey document the increase in the amount of long form children's educational and informational programming by the average station. These increases are seen for all types of stations across all market sizes. As a result, since most consumers can receive several stations, the total amount of children's educational and informational programs presents an abundance of choices for children and parents. Further, the overwhelming majority of these programs are aired at times where many children are in the audience.

This report will first discuss the survey procedures, followed by the overall national results. Results by station type (ABC, CBS, FOX, NBC and independent) and also by market size are then discussed. Finally, the starting times of the regularly scheduled programming are examined. Appendix 1 includes the actual survey questionnaire sent to the television stations. Appendix 2 provides a description of the responding stations.

Survey Methodology

Questionnaires were sent to all commercial television stations with known fax numbers in May 1994. A copy of the actual questionnaire is included in Appendix 1. Stations were asked to list all of their children's programming for Fall (October, November and December) 1990, 1993,

and 1994¹ that met the following definition for educational and informational children's programming:

Programming originally produced and broadcast for an audience of children 16 years old and younger which serves their cognitive/intellectual or social/emotional needs.

Stations were also asked to report the starting time of each program and the days of the week those programs were aired.

We asked stations to classify programs using the same criteria they would use in documenting compliance with FCC children's programming rules. Classifying these shows was especially difficult for the shows aired in Fall 1990 as stations at that time were *not* required to classify their children's television programming in this manner. This required substantial effort as stations had to review manually nearly four-year old programming schedules. Further, the records at many stations were not thorough enough to complete this task as such record keeping is not required by the FCC. As a result, some of the responding stations were not included in the results reported for 1990.

In addition to their regularly scheduled children's programs, stations were also asked to list all specials that met the definition. While shorter form (i.e., less than 30 minutes in length) educational and informational children's programming is aired by many stations, we did not include that programming in any of the results to be discussed. Nor does this survey reflect the wealth of family programs aired by stations which contributes to stations' obligations in serving the child audiences.

Of the 920 commercial television stations with valid fax numbers which received a fax questionnaire, 286 responded with usable questionnaires, resulting in a response rate of 31.1%. A description of the respondents is included in Appendix 2.

¹ We had hoped to report on 1990, 1993 and plans for 1994 totals for this type of programming. Unfortunately, the plans for Fall 1994 at many stations were still not finalized at the time of the survey. As a result, no reliable estimates of the amount of programming for next fall could be generated.

National Results

Overall, there has been a large increase in the amount of educational and informational children's programming between Fall 1990 and Fall 1993. In 1990, the average station aired slightly more than 2 hours (122.02 minutes) per week of regularly scheduled children's educational and informational programming. By 1993, the amount of this programming increased 81.0% to over 3-1/2 hours (220.81 minutes) per week.

As for specials, the average station in Fall 1990 aired over one hour (76.79 minutes), translating to an average 5.90 minutes per week. That increased 86.4% by Fall 1993 with nearly 2-1/2 hours (143.00 minutes), translating to 11.0 minutes per week of special educational and informational programming. Figure 1 on the following page shows these results.

Station Type

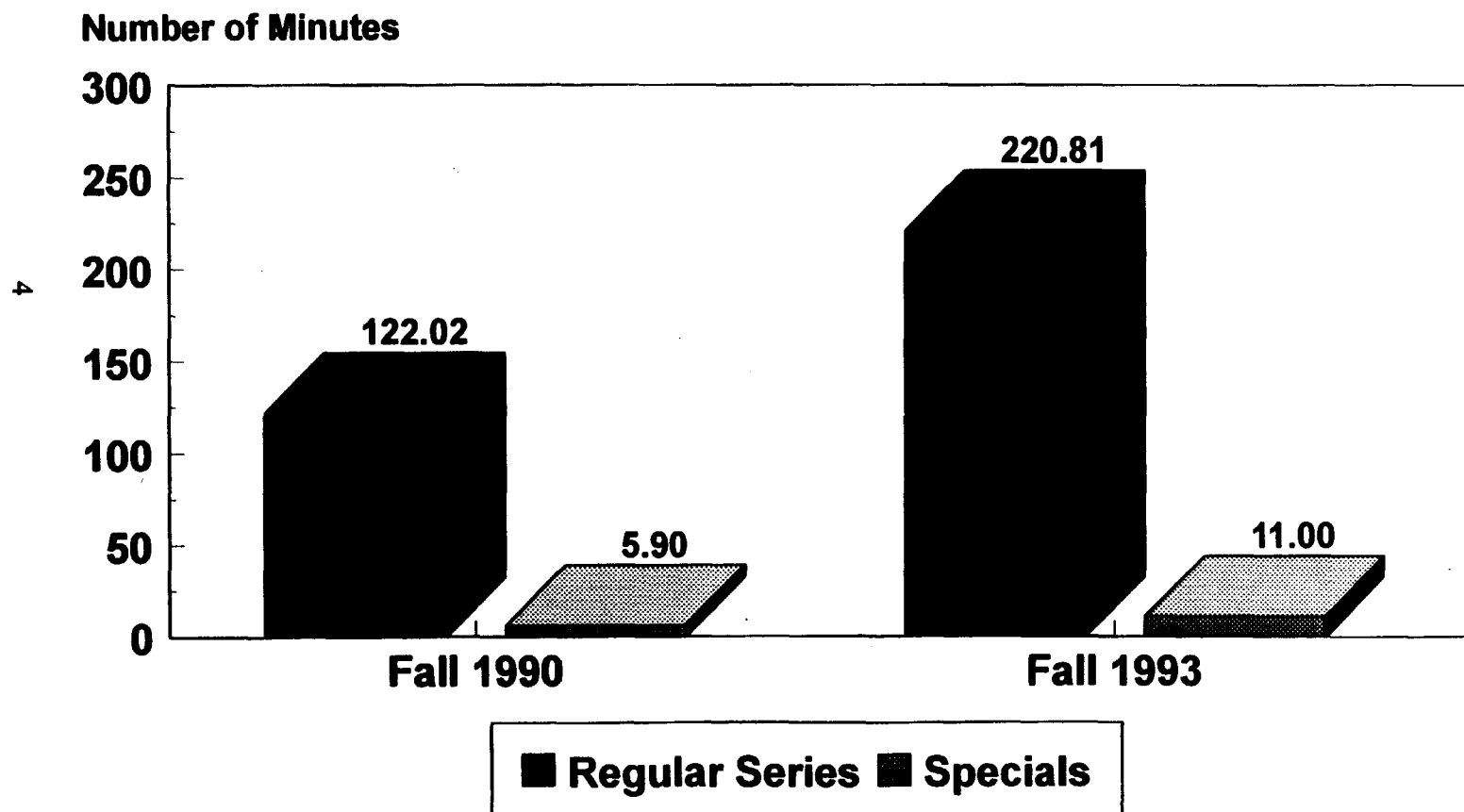
A substantial number of children's educational and informational programs originate with the various networks. In most cases, however, stations supplement that programming with educational and informational programming of their own or purchase that type of programming from national syndicators.

Figure 2 shows the amount of regularly scheduled educational and informational children's programming for responding stations affiliated with the four major television networks as well as independent stations. As shown, stations affiliated with all four networks and independent stations all noticeably increased the amount of regularly scheduled programs between Fall 1990 and Fall 1993.

Similar results for specials during these two time periods were also found. Figure 3 shows the average number of minutes per week of specials aired. Note that all of these specials were 30 minutes or more in length.

Figure 1

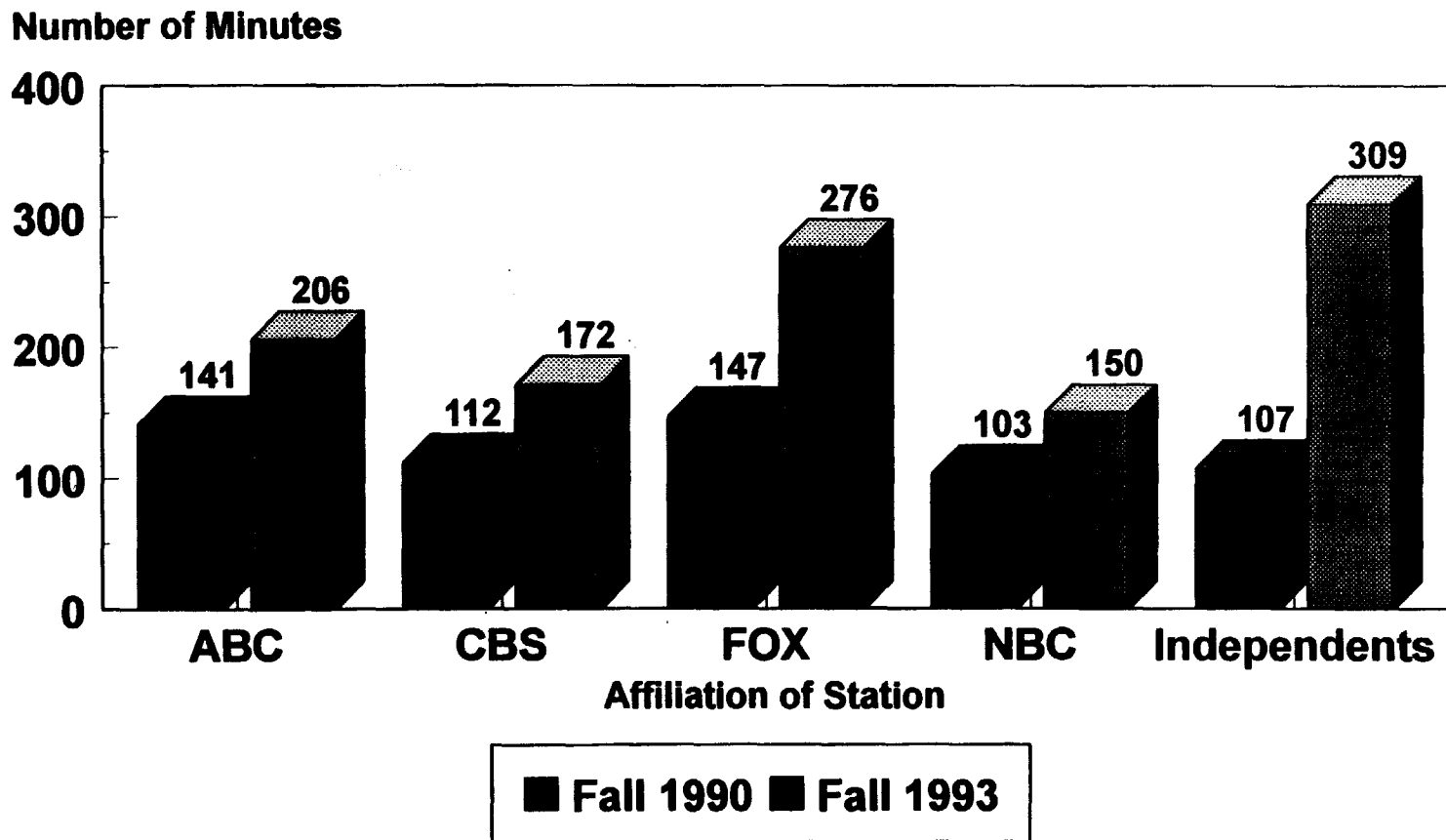
Children's Television Programming Average Minutes per Week



Source: 1994 NAB Children's Television Programming Survey

Figure 2

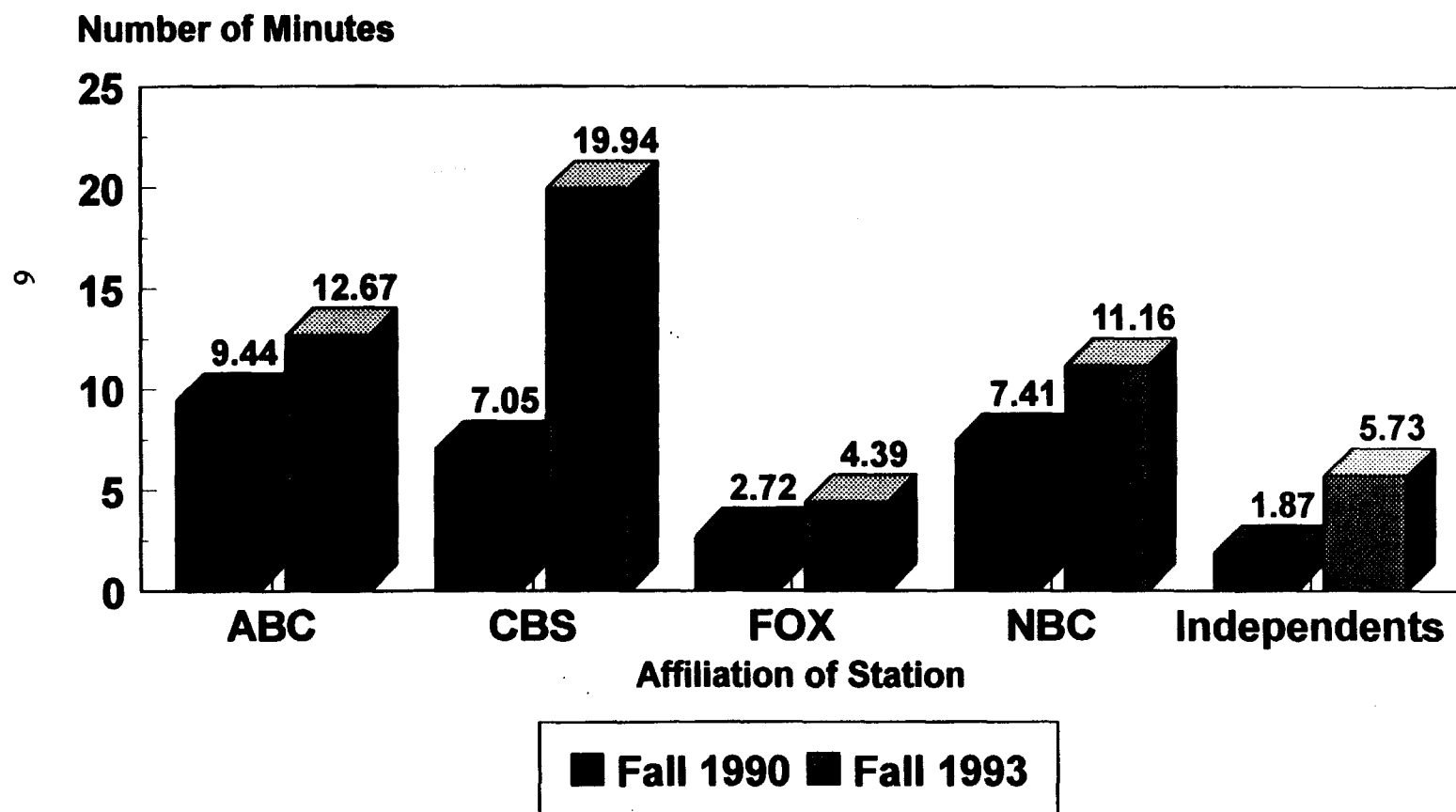
Children's Television Programming Regular Series: Average Minutes per Week



Source: 1994 NAB Children's Television Programming Survey

Figure 3

Children's Television Programming Specials: Average Minutes per Week



Source: 1994 NAB Children's Television Programming Survey

Market Size

Given the resources that are needed to provide educational and informational children's programs, it may be difficult for stations in smaller markets to provide as much as those stations in larger markets. Each station in markets of all sizes, however, is required to provide such programming. The total amount of regularly scheduled series and special programming fitting the FCC's definition was examined for the average station in different market size groupings.

Stations in the top market size groupings (ADIs 1-10 and 11-25) air more educational and informational children's programming than stations in smaller markets. However, stations in all market sizes increased the amount of this programming between Fall 1990 and Fall 1993. Figure 4 shows the results for the different market size groupings for regularly scheduled programming.

The results for special programming show the same story. Generally, stations in the larger markets air more special children's educational and informational programming, than smaller market stations. Yet, stations in all market size groupings showed increases between 1990 and 1993, with some of the largest increases in the smallest markets. Figure 5 shows the results for the different market size groupings for special programming.

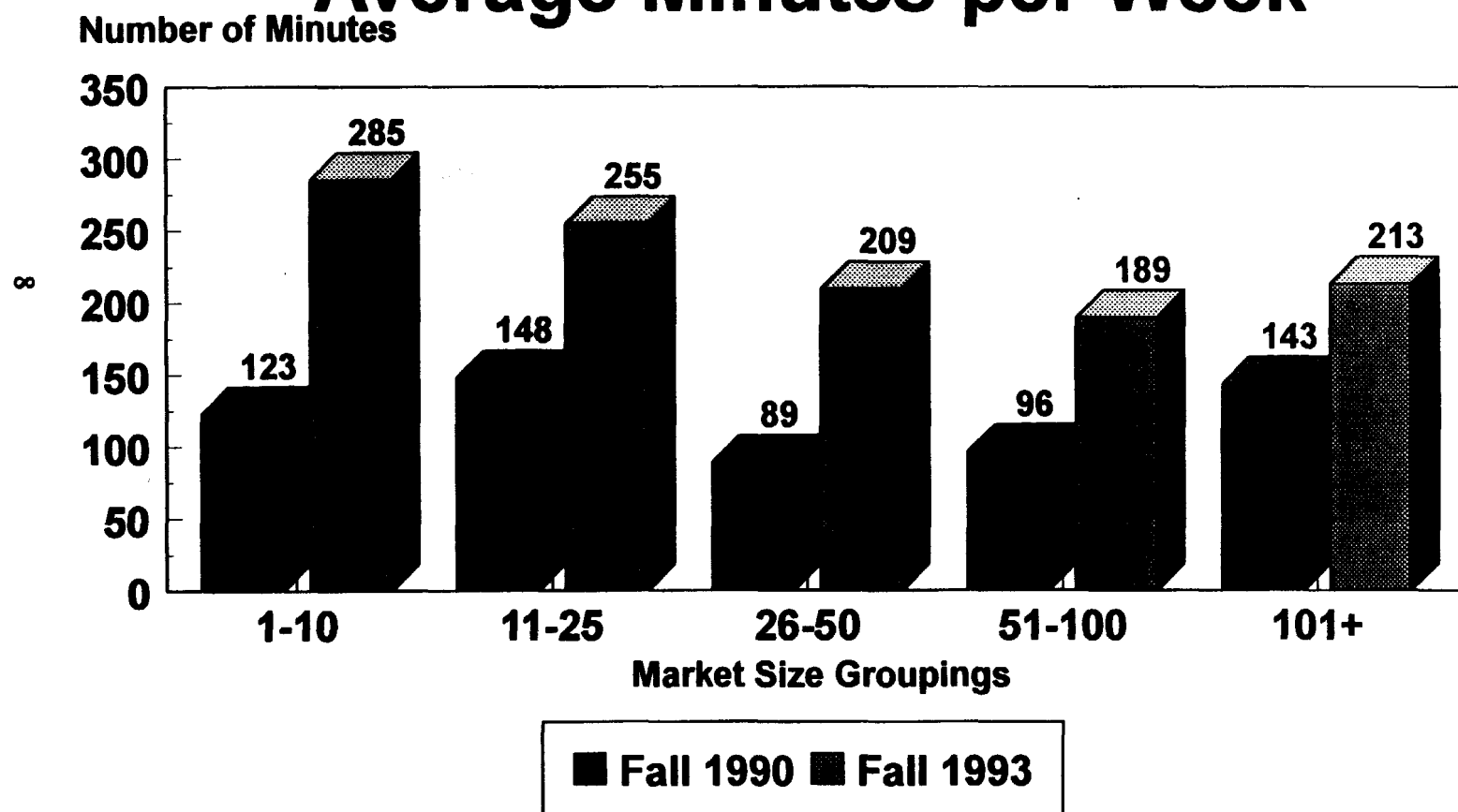
Starting Time

Some have argued that stations routinely air educational and informational children's programming at inconvenient times for children to watch. To evaluate this argument we examined the reported starting times for the regularly scheduled programs. Approximately 97% of regularly scheduled educational and informational children's programming is after 6:00 AM. Over four-fifths (80.6%) of all educational and informational children's television programs during the week started after 7:00 AM. Another one-sixth (16.3%) started between 6:00 AM - 7:00 AM, a time where there are still a substantial number of children in the audience.² Figure 6 shows the distribution of starting times for the different time periods.

² According to the 4th Qtr. Nielsen NTI National Peoplemeter Results, there are between 1.4 and 2.4 million children (aged 2-11) in the audience between 6:00 AM and 7:00 AM, Monday - Friday, and between .5 and .9 million Saturday and Sunday.

Figure 4

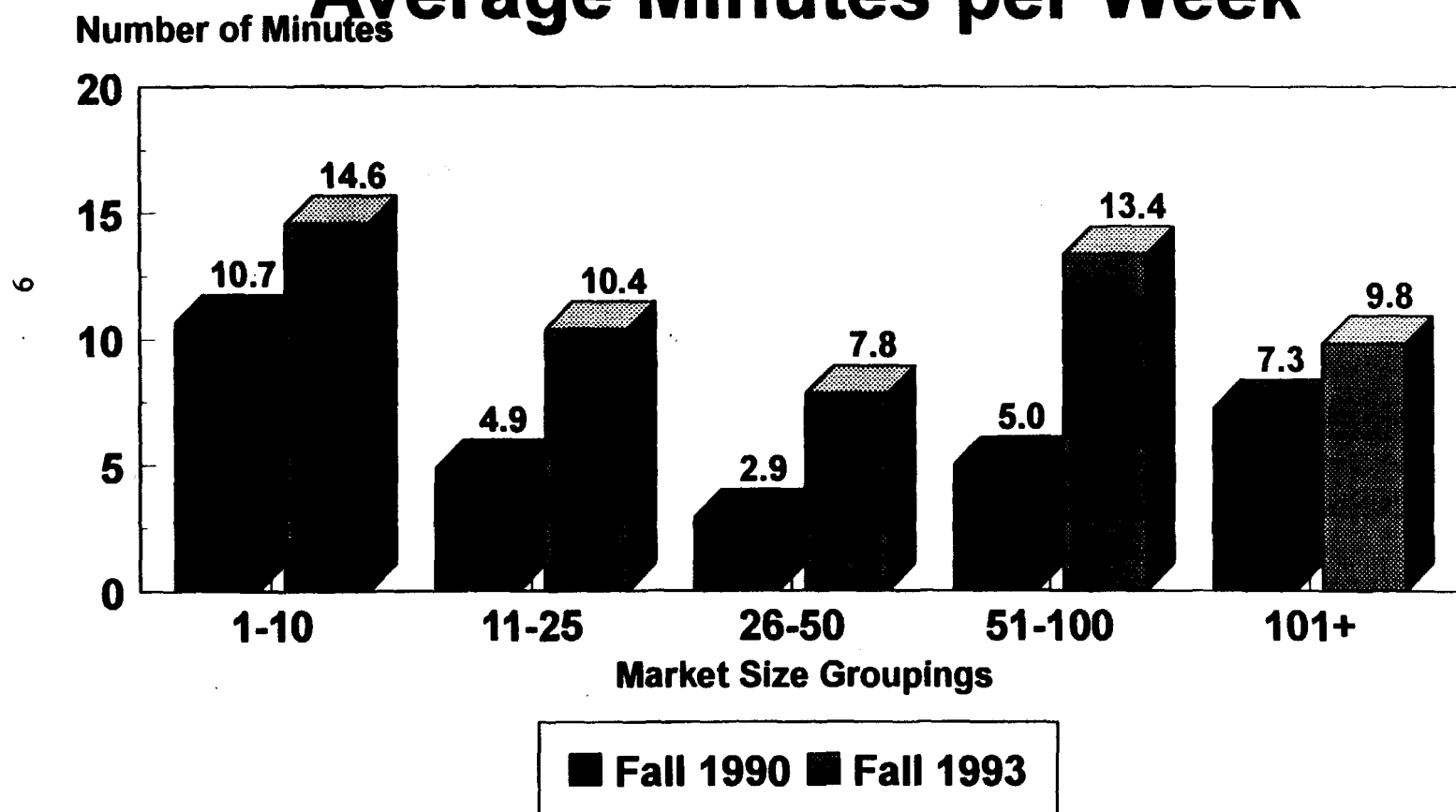
Children's Television Programming Regular Series: Average Minutes per Week



Source: 1994 NAB Children's Television Programming Survey

Figure 5

Children's Television Programming Specials: Average Minutes per Week

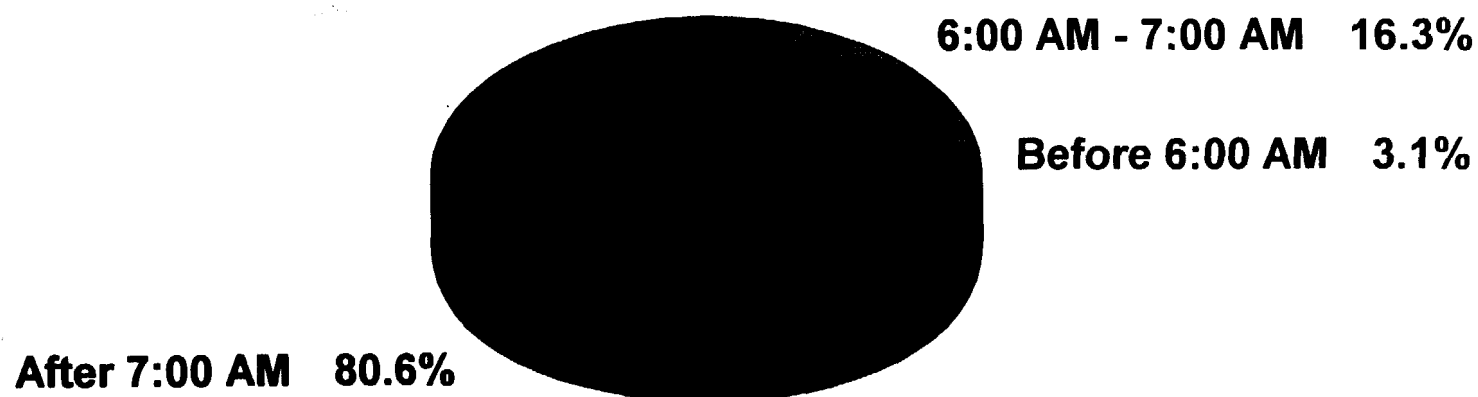


Source: 1994 NAB Children's Television Programming Survey

Figure 6

Starting Times for Regularly Scheduled Children's Television Programming

10



Fall 1993

Source: 1994 NAB Children's Television Programming Survey

Conclusion

While the Children's Television Act has only been in effect for less than three years, it is apparent that the marketplace and stations are responding to the new law and subsequent regulations, as well as to marketplace forces. Stations of all types and in markets of all sizes have noticeably increased the amount of long form children's programming and specials that are educational and informational.

APPENDIX 1



CHILDREN'S TELEVISION PROGRAMMING SURVEY

May 1994

We need your help! Please respond by Wednesday, May 18, 1994.

NAB is collecting key data from commercial television stations to help document the industry's response to the *Children's Television Act of 1990* and the FCC's *Report and Order* of April 1991 which implemented the specific rules. While your individual station data will be kept **confidential**, NAB plans to submit a **summary of these data to the FCC for its upcoming en banc hearing on children's television**. To accomplish this, we need a list of the programming primarily produced for children 16 years old or younger which was aired on your station and which you deem to be "educational or informational." We are collecting data for fall 1990, fall 1993, and your plans for fall 1994.

Please complete these few questions and fax your responses back to us at: 202-775-2980, no later than Wednesday, May 18, 1994. If you would like to discuss the survey, please contact: Mark Fratrik, VP/Economist, NAB Research and Planning, 202-429-5377. Thank you.

Definition: For purposes of this survey, we are concerned only with programming which meets this definition, in your judgment:

Programming originally produced and broadcast for an audience of children 16 years old and younger which serves their cognitive/intellectual or social/emotional needs.

You should use exactly the same criteria you now apply in deciding which children's programming to list in your public file, and for renewal proceedings when documenting your children's informational and educational program offerings.

Please complete the chart on the next page for the periods (October, November and December airdates) **Fall 1990, Fall 1993 actual broadcasts and Fall 1994 plans** for broadcasts of *children's educational and information programming*. You should include all sources (local, syndicated/barter, network).

Please make additional copies of the following page, if necessary.

Thank you.

APPENDIX 2

Description of Sample

One of the quality indicators of sample survey research performance is the match between the statistical sample and the population from which it is drawn. To assess the sample performance in this survey, in addition to response rate, we compared the sample statistics against two known population parameters -- market size and affiliation type.

In the table below, the match between the market size distributions of the sample and the population of all commercial television stations is excellent. There is a slight overrepresentation of stations in the 11-25 market group and a corresponding underrepresentation in the 101+ market group.

Market Size	All Commercial Stations (%)	Responding Stations (%)
Top 10	12.97	12.31
11 thru 25	12.76	14.55
26 thru 50	16.86	17.54
51 thru 100	25.09	25.75
101 plus	32.32	29.85

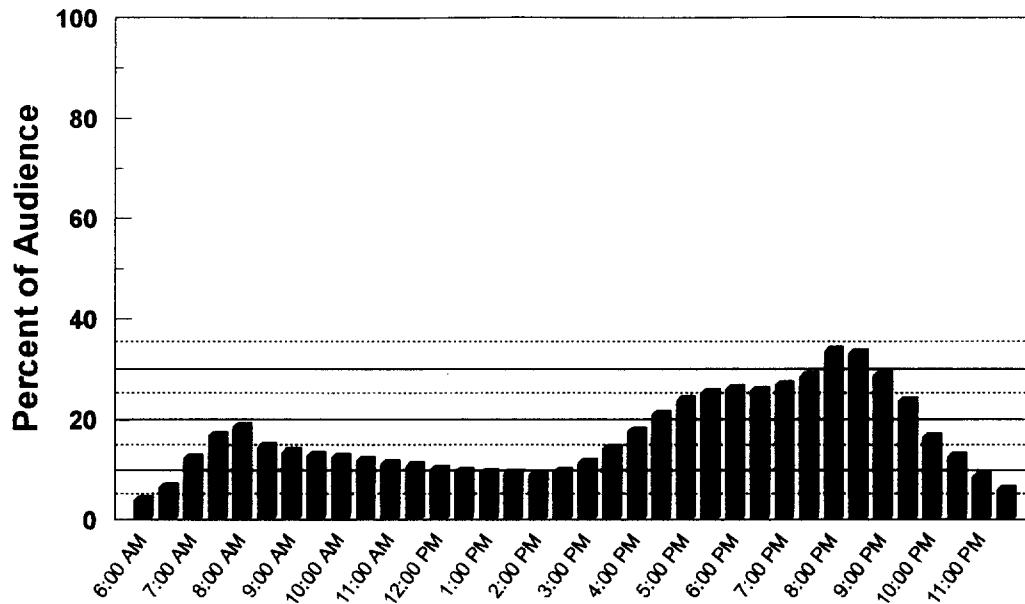
In terms of affiliation, the correspondence between the population and the sample is very good. The sample overrepresents Fox stations and underrepresents independent stations. Given our knowledge of the programming data, this would serve to perhaps understate the amount of children's programming carried on the average station.

Affiliation	All Commercial Stations (%)	Responding Stations (%)
ABC	19.58	22.03
CBS	18.74	20.98
FOX	14.45	18.18
IND	27.85	19.23
NBC	19.37	19.58

Kids 2-11 Television Viewing

Percent of Kids Viewing of All Children 2 - 11

Weekdays Monday - Friday

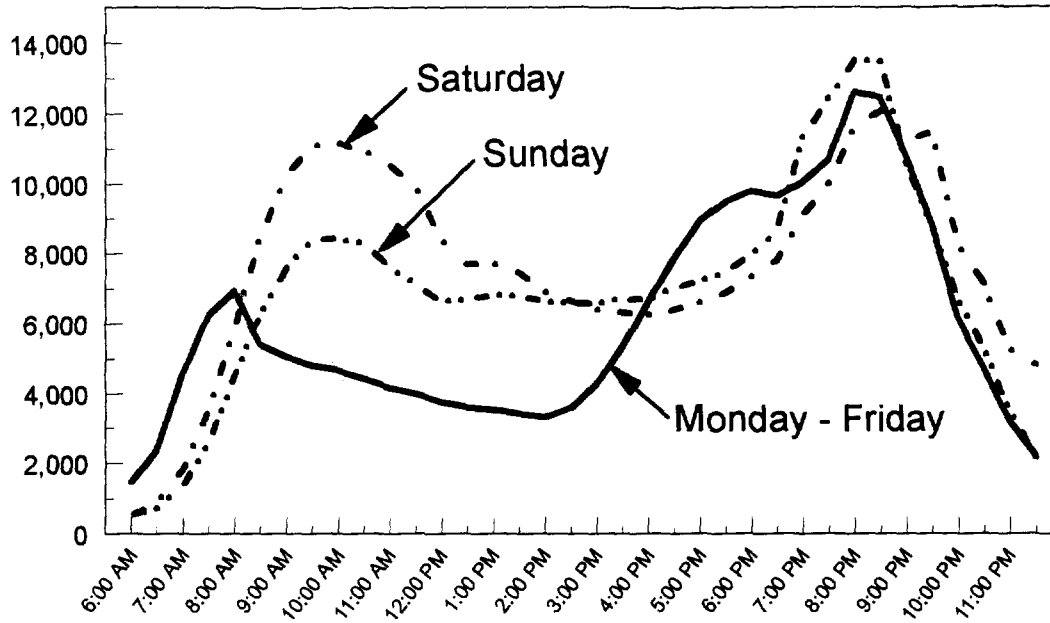


Source: Nielsen Peoplemeters, 4Q'93

Kids 2-11 Television Viewing

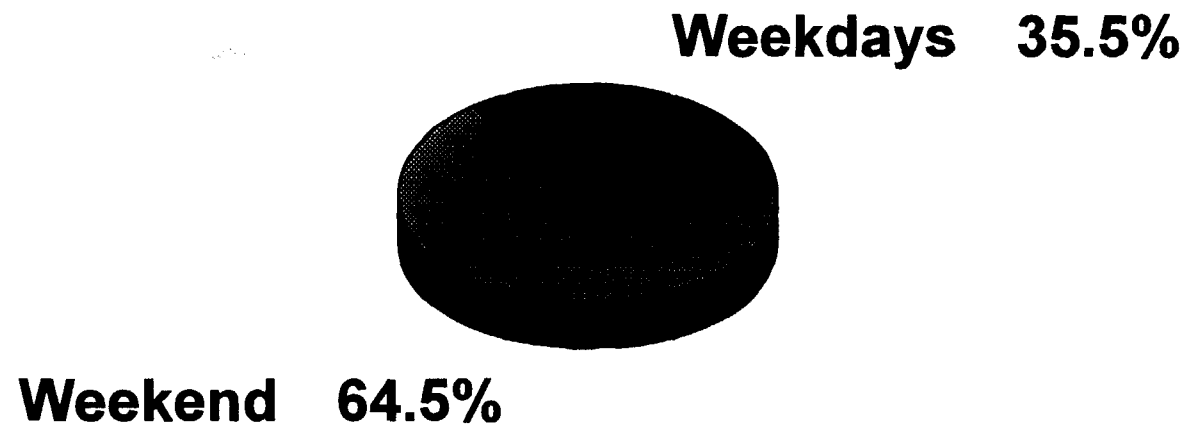
Children 2 - 11 Watching Television

Figures are in thousands



Source: Nielsen Peplemeters, 4Q'93

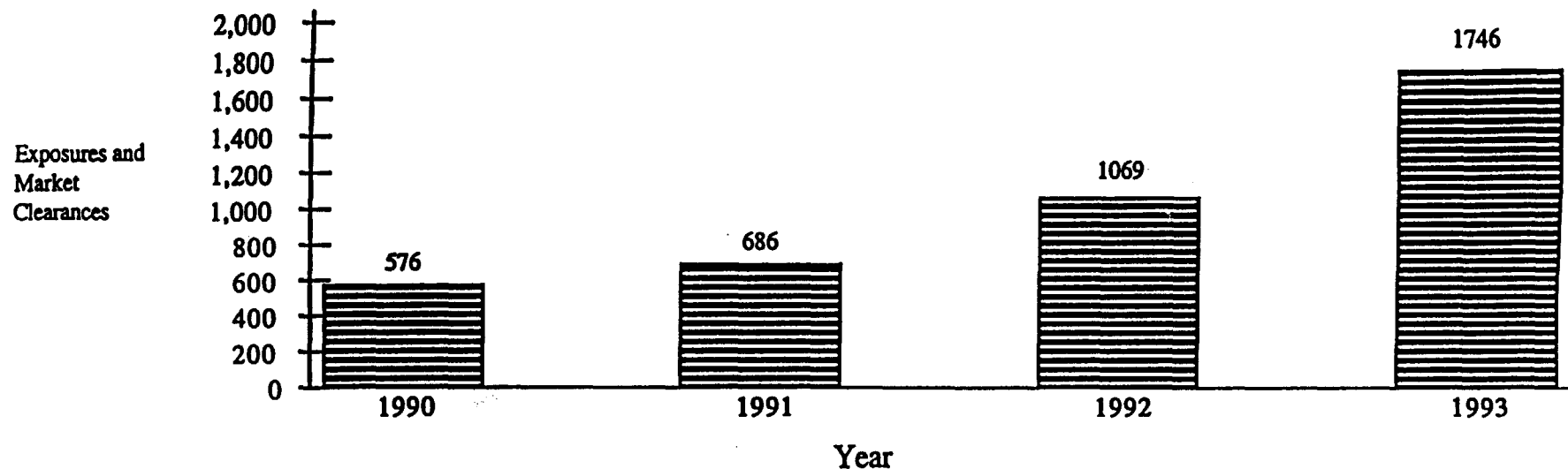
Distribution of Children's Educational and Informational Programming - Weekdays vs. Weekend



FALL 93

Source: 1994 NAB Children's Television Programming Survey

Syndicated Children's Educational and Informational Programs



Captain Planet
National Geo Special
National Geographic Assignment
Peppermint Place
Quiz Kids Challenge
WIDGET
Young Peoples Specials
Romper Room

Captain Planet
Captain Planet (repeat)
Kid's Club
Not Just News
Peppermint Place
Romper Room
Scratch
Wide World Kids
WIDGET
Young People's Specials
National Geographic

Beakman's World
Captain Planet
Children's Room
Faerie tale Theatre
National Geographic Special
Not Just News
Peppermint Place
Real News Kids
Romper Room
Scratch
Jacques Cousteau
WIDGET
Young Peoples Specials
Zoo Life

Adventures in
Wonderland
Best of National
Geographic
Bill Nye Science Guy
Captain Planet
The Children's Room
Energy Express
Hallow Spencer
Nick News
Not Just News
National Geographic
New Adventures of
Captain Planet
Peppermint Place
Real News for Kids
Romper Room
and Friends
Scratch
WIDGET
What's Up Network
Young Peoples
Specials
Jack Hannah's
Animal Adventures

NAB Evaluation of Squire Rushnell's Analysis of the Amount of Children's Educational and Informational Television 1980 v. 1994

In his submission to the recent FCC en banc hearing, Mr. Squire Rushnell of Rushnell Communications & Publishing, Inc. provided the Commission with some data and a chart showing the amount of network children's educational and informational programming for the years 1975, 1980, 1985, 1990 and plans for the upcoming 1994/95 season. Mr. Rushnell's results reportedly showed that the greatest number of hours aired by the networks was in 1980 and that, by the 1994/95 season, the now-rising amount of educational and informational network children's programming would not reach the 1980 level. While Mr. Rushnell has provided the Commission an interesting historical frame of reference for network programming, there are some flaws in his data, in his analysis and thus in his final results.¹

In viewing network-only programming, it is essential to remember that the television marketplace has changed dramatically in the last twenty years. In particular, the national syndication marketplace for children's programming (and also for other types) has exploded in amount and choice. As a result, stations affiliated with the networks air a considerable amount of children's educational and informational programming that is *not* provided by the major television networks.²

¹ It is not clear from the record whether Mr. Rushnell provided to the Commission or to the Commissioners his data supporting his comparisons, contained in his testimony to the FCC en banc hearing, of total network educational and informational children's programming over the years 1975-1994/95. We requested and received these data and here attach it as Appendix A.

² For example, the average ABC Network affiliate aired 205 minutes of children's educational and informational programming in Fall 1993, while the network was only providing 120 minutes of such

The flaws in Mr. Rushnell's analysis are: the inclusion of short form programming and specials, the uneven handling of preemptions of network programming, and the use of an incorrect amount of educational and information programming for both 1980 and the upcoming 1994/95 season. Once those problems are corrected, the number of hours of educational and informational programming provided by the networks do *not* represent a lower level in 1994/95 compared to 1980, but reveal instead an *increased* amount of educational and information network fare over the "high point" of 1980.

Combining Regularly Scheduled Shows with Other Programming

Mr. Rushnell includes various forms of programming in his comparisons of the amount of network children's educational and informational programming. While short form and special programming clearly contribute the educational and informational needs of children, the Commission has focused its evaluation of broadcasters' responsibilities under the Children's Television Act of 1990 on long form, regularly scheduled programming.

Moreover, it seems that one can only achieve a real "apples-to-apples" and accurate comparison with regard to regularly-scheduled programming.³ Trying to include specials and short-form programming (PSA's and short vignettes or "interstitials") in such comparisons necessarily raises questions of inaccuracies, speculation, underinclusion and unavailable data.

Any "prediction" of specials to be aired in 1994/1995 for purposes of comparison with what was presented in 1970 - 1990 seems speculative, given the very nature of "specials," which are dependent on current events and other uncertain considerations. As an example, before the 1990/91 season started, Capital Cities/ABC would not have known that it would air its Saturday morning children's special on the Gulf War crisis.

The difficulty in accurately counting PSA's and vignettes, both historically and predictively, similarly casts doubt on the accuracy of comparisons including them. Not only do the networks themselves not know the amount of educational PSAs and interstitials to be provided in the 1994/95 season, they themselves could not without serious difficulty, if at all,

programming. See "The 1990 Children's Television Act: Its Impact on the amount of Educational and Informational Programming," National Association of Broadcasters, June 1994

³ This is not to say that comparison of specials themselves cannot be useful or accurately done. See e.g., NAB Study, supra. It is to say, however, that specials can be fairly counted only historically and cannot be accurately predicted.

accurately reconstruct the amount of these “educational” short segments that aired in previous years.⁴ NAB suggests that others, including Mr. Rushnell, cannot accurately classify and count educational and informational PSA’s and vignettes across various years. Such uncertain, unreliable, uneven “counting” should not be included in a fair comparison of programming.

The only reliable “apples-to-apples” comparisons in this regard would seem to be those of regularly scheduled long-form programs.

Mishandling of Preemptions

In his attempt to be as thorough as possible, Mr. Rushnell tries to take into account the number of times regularly scheduled programs are preempted in order to weigh the number of actual showings over the entire year. While that attempt is laudable, its results are flawed for two significant reasons.

First, he cannot have a powerful-enough crystal ball to be able to predict the future in this regard. There is simply no way at this time to predict the number of preemptions these programs will have. Second, and perhaps more important, there were *no* preemptions included in his calculations for all years examined before 1994/95. While we do not have any records on this point (and apparently neither does Mr. Rushnell), it is inconceivable that in 1975, 1980, 1985 and 1990 there were *no* preemptions of the regularly scheduled children’s educational programming. Since there is no data on preemptions available for the earlier years, and since there is no way to accurately predict future preemptions, it would seem appropriate to *not* include a prediction for the upcoming season.

Corrected Number of Hours of Regularly Scheduled Programs

NAB’s review of the analysis and data of Mr. Rushnell, here attached as Appendix A, reveals both some under-including and some over-including which, while not substantial in raw amount, suggest a conclusion and a picture different from the ones drawn from the corrected data.

⁴ No recording or reporting or classifying of educational PSA’s was required prior to 1991. One network indicated that they could provide a reasonable estimate of PSA’s for the upcoming season. That amount is close to five times the amount that Mr. Rushnell has assigned to that network for the upcoming season. This again shows the difficulty in predicting this type of programming and why it should not be part of a year-to-year comparison.

One, Mr. Rushnell's data show that 9 hours of regularly scheduled educational and informational programming was counted for 1980.⁵ This represents an over-inclusion of .4 hours, resulting from his counting 52 weeks of CBS' "Marshall Efron's Illustrated, Simplified and Painless Sunday School," which only aired 10 weeks in the summer of 1980 (as well as every summer between July 1976 and September 1981).⁶ Thus, using Mr. Rushnell's data corrected by his own source material,⁷ the accurate amount of regularly scheduled network children's educational programming in 1980 was 8.6 hours per week.

Two, Mr. Rushnell's analysis omitted for the 1994/1995 season NBC's "NBA Inside Stuff," which is programmed for teens and classified by NBC and the producers⁸ as educational and informational. Including this half-hour weekly program increases Mr. Rushnell's counting of regularly scheduled 1994/1995 network programs from 8.5 hours per week to 9 hours per week.

An Apples-to-Apples Comparison

A look at Mr. Rushnell's data, corrected for uneven and inaccurate counting of preemptions and for the slight but inaccurate over-inclusion for 1980 and for the inaccurate under-inclusion for 1994/1995, reveals a different comparison of the educational programming presented by television networks 1980 versus 1994.⁹ When an apples-to-apples comparison is made, i.e., one comparing reliable data on regularly scheduled programs, the results show that *in 1980 the television networks provided 8.6 hours per week of regularly scheduled educational children's programming and in 1994/95 the networks are providing 9 hours of the same type of fare. Thus the networks are providing now more regularly scheduled educational children's programming than the previous high water mark of 1980.*

⁵ It is important to point out that 5 of the 9 hours reported by Mr. Rushnell are accounted by Captain Kangaroo aired on CBS. Subsequent to 1980 CBS decided to provide news and information during the early morning time period rather than Captain Kangaroo and accordingly changed its morning programming schedule.

⁶ George Woolery, *Children's Television The First 36 Years*, Vol. II, Scarecrow Press, 1985, pp. 329-330.

⁷ Id.

⁸ According to the NBA there are educational consultants working with the producers and writers of this program to insure that it meets the definition of educational and informational.

⁹ See Appendix B for Corrected data.

And this is at a time when stations, which are the actual broadcasters in each market, air substantially more non-network programming for children than they did in 1980. Thus the only accurate pictures of what stations air for children and of what children have available to them can be seen on the local station level, pictures presented in the NAB Study and the INTV Study submitted in this proceeding. Those pictures show the kind of increase in educational and informational children's programming called for in the Children's Television Act.